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September 10, 2020

## **VIA ECF**

Hon. George B. Daniels  
United States District Judge  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Miguel Baez Duran et al v. E L G Parking Inc. et al; 18-cv-06685-GBD

Your Honor:

This office represents Plaintiffs in the above-referenced matter. We hereby request an informal conference with the Court pursuant to Local Civil Rule 37.2 to address the failure of defendants to respond to document requests and interrogatories served by Plaintiff, and to produce responsive documents. Plaintiffs also respectfully requests that the Court set a schedule for outstanding depositions of Defendants.

On or about September 6, 2019, Plaintiffs served document requests and interrogatories on Defendants. Plaintiffs made good faith efforts, in writing, to obtain responses on October 8, 2019; July 29, 2020; and August 20, 2020. Defendants have not produced responses. Defendants have also not produced initial disclosures.

Plaintiffs respectfully request that the Court compel the Defendants to respond to the interrogatories and documents requests in writing and produce any responsive documents, upon penalty of other sanctions provided for by Rule 37 of the Federal Rules of Civil Procedure, including preclusion of evidence and testimony and striking of Defendants' answer if they fail to comply with the court's order. Plaintiffs further request that the Court set a schedule for outstanding depositions to take place after Defendants fully respond to outstanding document demands and interrogatories.

Lastly, Plaintiffs requests pursuant to Rule 37 that Defendants pay Plaintiffs' attorneys' fees for the making of this motion.

We thank the Court for its attention to this matter.

Regards,

By: /s/ Clifford Tucker  
Clifford R. Tucker, Esq.